



January 20, 2011

**DRAFT DECISION ON CITY OF CAMBRIDGE SEWER SEPARATION WORK ON
W.R. GRACE PROPERTY**

Dear Mr. O’Riordan,

The Cambridge Public Health Department has reviewed the Asbestos Soil Management Plan submitted to our office on January 10th, 2011. The Cambridge Public Health Department is issuing this draft decision in order to establish whether the dust and airborne asbestos mitigation measures required under the Cambridge Asbestos Protection ordinance (CAPO) are being met within this plan for proposed disruption of the existing asphalt and soil cap associated with CSO trench excavation work at 62 Whittemore Avenue in Cambridge.

This department does acknowledge that the City of Cambridge is not the Responsible Party ultimately accountable under CAPO and the Massachusetts Contingency Plan / MGLA 21E. However, by seeking the permission of the owner and Responsible Party, *W.R. Grace & Company – CONN*, the City of Cambridge is expected to meet the same protective standards established by CAPO that would otherwise be imposed directly on the property owner. The following specific items need to be addressed before final approval.

Page 8: Soil Management Practices:

The use of soil wetting or misting “as it is removed” does not sufficiently establish whether dust suppression with wetting or misting will be feasible with a single fogging nozzle. Indicate in ASMP what the expected range of misting coverage would be necessary for full suppression of excavated soils. Continuous misting or wetting is necessary to further reduce the risk that fugitive dust could escape the containment structure during entry and exit of personnel and material or be lost from the soil itself during later transfer and transport.

Page 10: Venting of Enclosures:

*It is not clear how the air exchange rate (listed in the ASMP as approximately 12 air changes per hour) was calculated. If there are 4,000 cubic feet per minute (2,000 cfm air filters X2) moving air out of the enclosure (= 240,000 cubic feet per hour) and the total air volume is 30’ X 50’ X 20’ ft (30,000 cubic feet) then we would expect an air exchange rate of 240K/30K = **about 8 air changes per hour, rather than 12 changes per hour listed in the ASMP.***

Page 10: Venting of Enclosures

The pressure differential identified, 0.02 inches on a water gauge, should be sufficient to overcome intrusion of outside air as staff enter and leave the enclosure. If there is an industry standard or engineering rule of thumb that regards 0.02 inches differential is effective in an enclosure with periodic arrival and departure of site workers.

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Page 10: Dust Control

The ASMP should indicate whether wheel washers or wheel wells will be used by trucks that are removing soil. This should be included if there is any indication that dust or dirt is being tracked onto nearby streets on tires of vehicles coming off the site.

Page 11: Dust Monitoring:

Use of the term “respirable particulate” in the Dust Monitoring Plan section should be clarified. This terminology is sometimes also associated with PM_{2.5}, with a much lower 24-hours NAAQS (35 micrograms/kilogram). Simple reference to “PM₁₀” would be less ambiguous. Likewise, expression of the applicable 24-hour NAAQS standard would be more easily recognized if expressed in micrograms/cubic meter rather than milligrams/cubic meter as it is in all EPA public literature.

Public comments on this draft received during the 20-day comment period (January 20-February 9) will be taken into consideration by the Cambridge Commissioner of Health (or his or her agent) before the Final Decision is issued.

A final decision will be issued and placed in all public repositories in an expeditious and thorough manner after the comment period has expired. If you have any questions or any concerned party has question or concerns all queries regarding this decision should be directed to:

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